

WWR# 040415970

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:
ROBERT LEE BOLTZ
LINDA L BOLTZ

Debtors

PSECU

Movant

CASE NO. 18-16837-elf

CHAPTER 13

Hearing Date: 8/29/2019

Hearing Time: 11:00 a.m.

REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to F.R.C.P. 34, Movant hereby requests that the Debtor produces for inspection by the undersigned attorney for the Movant the following:

1. If you deny any or all of the subsections under Movant's Request for admission No. 1:
 - (a) Canceled check, receipt, proof of money order, or other documentation evidencing that the payment due on 4/17/2019 through 7/17/2019, was tendered to Movant.
2. Copies of any and all documents, federal and state court opinions (whether published or unpublished), federal guidelines or other applicable statutory or common law bases upon which you rely in denying Plaintiff's Request for Admission Number 1.

Respectfully Submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

/s/ Brian Langford

Brian Langford

Weltman, Weinberg & Reis Co., L.P.A.

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